

FILED  
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT 2005 FEB -3 P 12: 26  
FOR THE DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT  
DISTRICT OF MASS

JUE ZHANG,

Plaintiff,

v.

C.A. NO. 04-12735PBS

MICHAEL P. GOLDFINGER, M.D., and

SHRAGA N. GOLDBERG, M.D.,

Defendants.

**REQUEST FOR TRIBUNAL BY THE DEFENDANT,**  
**MICHAEL P. GOLDFINGER, M.D.,**  
**PURSUANT TO M.G.L., CHAPTER 231, §60B**

The defendant, Michael P. Goldfinger, M.D., hereby moves this Honorable Court to convene a Medical Malpractice Tribunal pursuant to M.G.L., Chapter 231, Section 60B, and states in support of this Motion the following:

1. This is an action that includes allegations of malpractice, mistake or error against a provider of health care;
2. The Complaint includes allegations of negligence;
3. The defendant is entitled by statute to a Tribunal hearing on the allegations that relate to its actions as a health care provider;
4. The defendant is a provider of medical and health care services to patients as defined in M.G.L. c. 231, § 60B;
5. The defendant is a radiologist resident;
6. Therefore, a board-certified radiologist is requested by the defendant to serve as the medical member of the Tribunal; and
7. The defendant Michael Goldfinger, M.D. is located in Suffolk County.

For the Defendant,  
Michael Goldfinger, M.D.,  
By his attorneys,

---

Sidney W. Adler, BBO #012660  
Jennifer Boyd Herlihy, BBO #636815  
Adler, Cohen, Harvey, Wakeman  
& Guekquezian, LLP  
230 Congress Street, Tenth Floor  
Boston, MA 02110  
(617) 423-6674

WCE  
2/3/05  
2/3/05  
2/3/05